

SO. CAL. EQUAL ACCESS GROUP

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Attorneys for Plaintiff, MARQUISE BAILEY

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MARQUISE BAILEY,

Plaintiff,

vs.

JESUS J. ROBLES JR. D/B/A
PLANET PET SHOP; MERCEDES D.
CHAIDEZ, AS TRUSTEE OF THE
CHAIDEZ FAMILY TRUST; and
DOES 1 to 10,

Defendants.

Case No.: 2:23-cv-10003 MCS (MRWx)

**JOINT STIPULATION FOR
DISMISSAL PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Attorneys for Plaintiff MARQUISE BAILEY (“Plaintiff”) and Defendants JESUS J. ROBLES JR. D/B/A PLANET PET SHOP and LILIA CHAIDEZ, CONSERVATOR OF OWNER, stipulate and jointly request that this Court dismiss the above-captioned action, without prejudice, in its entirety. Each party shall bear his/her/its own costs and attorneys’ fees.

Respectfully submitted,

DATED: June 5, 2024

SO. CAL. EQUAL ACCESS GROUP

By: /s/ Jason J. Kim
Jason J. Kim
Attorneys for Plaintiff

DATED: June 5, 2024

By: /s/ Lilia Chaidez
Lilia Chaidez, conservator of owner, as in pro
per

DATED: June 5, 2024

By: /s/ Jesus J. Robles
Jesus J. Robles, as in pro per

Certification Pursuant to Local Rule 5-4.3.4(a)(2)(i)

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Jason J. Kim, do attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

Dated: June 5, 2024

By: /s/ Jason J. Kim
Jason J. Kim

PROOF OF SERVICE

I, Mike Jun, am a resident of the United States and of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my address is

101 S. Western Avenue
Second Floor
Los Angeles, California 90004

On June 5, 2024, I served the foregoing document by placing the true copies thereof enclosed in sealed envelopes addressed as follows:

Lilia Chaidez	Jesus J. Robles
9165 Cecilia St.,	6624 Eastern Ave.,
Downey, CA 90241	Bell Gardens, CA 90201

DOCUMENT(S): JOINT STIPULATION FOR DISMISSAL PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)

- (X) BY U.S. POSTAL MAIL: I am “readily familiar” with the firm’s practice of collection and processing correspondence and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.
- () BY PERSONAL SERVICE: I delivered a true copy of the foregoing document(s) in a sealed envelope by hand to the above addressee(s).
- () BY FACSIMILE: I caused said document(s) to be transmitted by facsimile to the address(es) set forth above during normal business hours. Said transmission was verified as complete and without error.
- () BY OVERNIGHT DELIVERY / FEDEX EXPRESS: I caused said envelope(s) to be sent overnight delivery by FedEx Express to the address(es) set forth above.
- () BY ELECTRONIC MAIL: I transmitted the foregoing document by electronic mail to the email address(es) set forth above during normal business hours. Said transmission was verified as complete and without error.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on June 5, 2024, at Los Angeles, California.

